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Attorneys for Defendant
MA CERES, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

DARREN GILBERT,

Plaintiff,

vs.

MA CERES, LLC; TURQUOISE
ENTERPRISES LLC D/B/A JENNY'S,

Defendants.

Case No. 1:22-cv-00784-DAD-BAM

**Stipulation and Proposed Order to Extend
Time for Defendant Ma Ceres, LLC to
Respond to Initial Complaint**

Current response date: 8/29/2022

New response date: 9/26/2022

IT IS HEREBY STIPULATED by and between Plaintiff DARREN GILBERT ("Plaintiff") and Defendant MA CERES, LLC ("Defendant") (Plaintiff and Defendant are referred to collectively herein as the "Parties"), by and through their attorneys of record, as follows:

1. Plaintiff agrees to give Defendant an extension of time to respond to the Complaint.
2. The original due date for Defendant to respond to the Complaint was on August 1, 2022. The Parties thereafter agreed to extend the due date to August 29, 2022, which was approved by the Court.
3. The Parties have since then continued exploring settlement and continue to do so.

4. It is agreed and stipulated that the new due date for Defendant to respond to the Complaint will be September 26, 2022. This extension of time is Defendant's second extension and does not alter the date of any event or deadline already fixed by Court order.

The Parties jointly request that the Court enter an Order consistent with the foregoing. Good cause exists for this extension for the purpose of reducing fees and costs, as counsel are continuing to explore settlement in this action, are actively involved in settlement negotiations, and believe that the additional time to investigate this matter and engage in further settlement discussions that will be afforded by the requested extension of time to respond to the Complaint will facilitate, and increase the chances of, early settlement of this matter. It is hoped that, as a result of the requested continuance and additional time to investigate and negotiate, a settlement as to all claims and all Parties will be reached in this matter.

DATED: 8/24/2022

MOORE LAW FIRM, P.C.

By: /s/ Tanya E. Moore
Tanya E. Moore, Esq.
Attorneys for Plaintiff
DARREN GILBERT

DATED: 8/24/2022

THE KARLIN LAW FIRM LLP

By: /s/ Michael J. Karlin
Michael J. Karlin, Esq.
Attorneys for Defendant
MA CERES, LLC

ORDER

Pursuant to the parties' stipulation, and good cause appearing, the deadline for Defendant Ma Ceres, LLC, to respond to the complaint is extended to September 26, 2022.

IT IS SO ORDERED.

Dated: August 24, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE